

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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**NICHOLAS FITZGERALD**, on behalf of  
himself and all others similarly situated,

Plaintiff,

Civil Action

-v.-

11-CV-04287 (KM)(MCA)

**GANN LAW BOOKS, INC., GANN LEGAL  
EDUCATION FOUNDATION, INC. AND  
MICHAEL PROTZEL,**

Defendants.

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**DECLARATION OF L. STEPHENS TLIGHMAN**

I, L. STEPHENS TLIGHMAN, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the President of Tilghman & Co., P.C., which was appointed as the Claims Administrator of this class action pursuant to the Court's April 25, 2014 Order.
2. Defendants provided me with a list of persons to whom they attempted to send facsimiles but did not receive confirmation that the facsimiles were received. There were 1,813 names on the list, including mailing addresses for all but six names on the list. I then sent short-form class notice to the 1,807 addresses. Of these, 421 were returned by the U.S. Postal Service, though I was able to find current addresses and successfully mail notice to 14 of these 421 class members. In addition, I mailed notices and claims forms to an additional 36 persons who contacted me to request them.
3. The April 25, 2014 Order of this Court set a deadline of October 23, 2014 to file an objection to the preliminary class settlement or opt out of the class. I have not received any objections and have received one opt out.

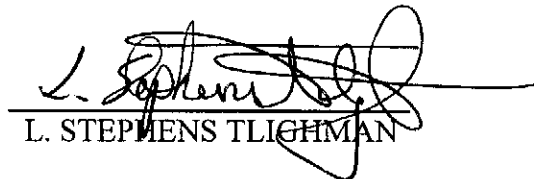
4. The deadline for submitting a claim was August 14, 2014.

5. We received 290 claim forms from members of the class. The below chart summarizes that there were 284 claims by those who did not have a copy of the facsimile(s) they received ("Undocumented Faxes) which will pay out \$42,125.00 and 19 claims by those with copies of the facsimiles which will pay out \$11,550.00. Thus, without taking into account any pro rata distribution as mentioned in paragraph 10(e) of the Settlement Agreement, the total amount to date that is payable in cash to the class members is \$53,675.00.

<b>Undocumented Faxes</b>	<b>Claims</b>	<b>Per Fax Line</b>	<b>Total</b>
Claimed 1 fax	242	\$ 125	\$30,250.00
Claimed 2 faxes	34	\$ 250	\$8,500.00
Claimed 3 faxes	5	\$ 375	\$1,875.00
Claimed 4 faxes	3	\$ 500	\$1,500.00
Claimed 5 faxes	0	\$ 625	-----
<b>Totals</b>	<u>284</u>		<u>\$42,125.00</u>
<b>Documented Faxes</b>	<b>Claims</b>	<b>Per Doc. Fax</b>	<b>Total</b>
Claimed 1 fax	3	\$ 175	\$525.00
Claimed 2 faxes	4	\$ 350	\$1,400.00
Claimed 3 faxes	2	\$ 525	\$1,050.00
Claimed 4 faxes	1	\$ 700	\$700.00
Claimed 5 faxes	9	\$ 875	\$7,875.00
<b>Totals</b>	<u>19</u>		<u>\$11,550.00</u>

6. In addition, there were 216 valid claims for MCLE.

Executed this 18<sup>th</sup> day of September 2014, in Birmingham, Alabama.

  
L. STEPHENS TLGHMAN